

January 28, 2013

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: AT&T and NTCA Petitions on Transition from Legacy Transmission Platforms to Services Based on Internet Protocol, GN Docket No. 12-353

Dear Ms. Dortch:

The Information Technology Industry Council (ITI) represents forty eight of the nation's leading information and communications technology companies, including computer hardware and software, Internet services, mobile devices, and wireline and wireless networking companies.<sup>1</sup> ITI is the voice of the high tech community, advocating policies that advance U.S. leadership in technology and innovation, open access to new and emerging markets, support e-commerce expansion, and enhance domestic and global competition.

ITI's members are a driving force behind the innovation, investment, and explosive growth that has taken place in the broadband ecosystem over the past decade. ITI supports forward-looking policies that promote consumer and business adoption of next generation technologies and products, and believes it is important for the Commission to look for opportunities to ease the transition to new technologies and services. Facilitating the transition from time-division multiplexing (TDM) technology to Internet Protocol (IP) enabled networks will allow consumers and businesses to benefit from the multitude of services that can be offered via IP-based technology and should be a high priority for the Commission.

ITI views a trial and rulemaking process, such as those requested in the above referenced petitions, as being beneficial to the IP transition. Although there is widespread agreement that older TDM-based networks will be supplanted by IP-networks in the future, there may be regulations at the state and federal level that will impede the migration. A limited trial would streamline the transition by determining how to facilitate it more broadly in an

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<sup>1</sup> A list of ITI's member companies can be found on our website:  
<http://www.itic.org/about/member-companies.dot>

organized and orderly process from a technical point of view and will reveal very useful information on the policy issues that must be addressed to facilitate the transition from TDM to IP. The retirement of obsolete facilities, methods for interconnection, the replacement of consumer premise equipment, ensuring public safety, and many other issues that arise from the transition can be addressed in the trials before expanding the transition more broadly. A controlled trial process will ultimately accelerate the transition, bringing the many benefits of IP-enabled networks to more households and businesses quickly by identifying potential problems before a widespread implementation. It will also provide an opportunity to review the multiple efforts related to the IP transition that are currently underway at the Commission, as consolidating some of those proceedings may facilitate the transition.

Transitioning to next generation IP-enabled networks will enable broader consumer access and choice among the variety of products and services offered in the broadband marketplace. Communications, entertainment, productivity, educational, and numerous other resources and opportunities will be expanded as the transition occurs, and consumers and businesses have access to more advanced broadband networks with significantly faster data rates than TDM networks deliver. The proliferation of IP-enabled networks, and the continued unregulated status of over-the-top services, will foster opportunities for innovation and expand services and products available to consumers. To fully realize these benefits, ITI urges the Commission to move forward with trials, and make every effort to expedite a smooth and seamless transition to IP-enabled networks.

Respectfully Submitted,

/s/ Vince Jesaitis

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